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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Jose Talavera, An individual residing in)
Nevada,)
)
Plaintiff,)
)
Vs.)
)
Sysco Corporation, et al,)
)
Defendants.)

Case No.: 2:16-cv-01382-JCM-VCF

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANT'S MOTION FOR JUDGMENT ON THE PLEADINGS**
(First Request)

Plaintiff, Jose Talavera, by and through his undersigned counsel, hereby respectfully requests an extension of time of fourteen (14) days to respond to DEFENDANTS SYSCO CORPORATION'S AND SYSCO FOOD SERVICE OF LAS VEGAS' MOTION FOR JUDGMENT ON THE PLEADINGS. Counsel for Plaintiff has consulted with Counsel for Defendant who has consented to the relief requested herein.

1 1. On June 17, 2016, Plaintiff filed his Complaint in this case. See Docket Entry (“D.E.”) 1.
2 The Complaint alleges employment discrimination which violates Title VII of the Civil Rights Act
3 of 1964 and N.R.S. 613.330.

4 2. On September 7, 2016, Defendant filed their Answer to Plaintiff’s Complaint. See Docket
5 Entry (“D.E.”) 6.

6 3. On September 28, 2016, Defendant filed their Motion for Judgment on the Pleadings. See
7 Docket Entry (“D.E.”) 14.

8 4. Under the Federal Rule of Civil Procedure and LR 7-2, Plaintiff’s response to the Motion
9 for Judgment on the Pleadings would be October 17, 2016.

10 5. On October 7, 2016, Bradley Bellisario, Esq., Counsel for Plaintiff, conferred with Dustin
11 M. Dow, Esq., Counsel for Defendant, regarding the timing of Plaintiff’s response to the Motion
12 for Judgment on the Pleadings. Counsel for Defendant consented to Plaintiff’s request to enlarge
13 the time for filing the response by fourteen (14) days, which would make the new deadline October
14 31, 2016.

15 6. Pursuant to FRCP 6(b)(1), the Court may, for good cause, extend the time with or without
16 motion before the original time expires to respond to a motion.

17 7. The relief requested herein is for good cause and will not result in undue delay in the
18 administration of this case. The Motion for Judgment on the Pleadings raises complex issues of
19 law. An enlargement of time for filing Plaintiff’s response is necessary due to Plaintiff’s Counsel’s
20 workload and need to confer with Plaintiff.

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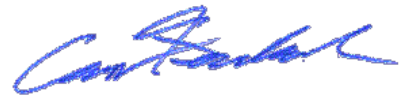
1 8. No other enlargements of time have been previously requested in this case. No dates have
2 been set for a pre-trial conference or trial. An Early Neutral Evaluation Session has been set for
3 November 10, 2016.

4 IN WITNESS WHEREOF, Plaintiff respectfully requests a fourteen (14) day enlargement
5 of time, up to and including, October 31, 2016, for Plaintiff to respond to Defendant's Motion for
6 Judgment on the Pleadings.

7
8 DATED this 11th day of October, 2016.

9 Submitted by: /s/ Bradley Bellisario
10 BRADLEY BELLISARIO, ESQ.
11 Nevada Bar No. 13452
2945 N Martin L King Blvd
North Las Vegas, NV 89032
Attorney for Plaintiff Jose Talavera

12
13
14 IT IS SO ORDERED:

15 

16 UNITED STATES MAGISTRATE JUDGE

17 DATED: October 14, 2016

CERTIFICATE OF SERVICE

I certify I am an employee of Bellisario Law, LLC, and that on this 11th day of October, 2016, I caused to be deposited for mailing a copy of the foregoing **PLAINTIFF'S UNOPPOSED MOTION FOR EXTENTION OF TIME TO RESPOND TO DEFENDANT'S MOTION FOR JUDGMENT ON THE PLEADINGS**, addressed as follows:

Marquis Aurbach Coffing
Jason M. Gerber, Esq.
10001 Park Run Drive
Las Vegas, Nevada 89145

Baker Hostetler
Jeffrey R. Vlasek, Esq.
Dustin M. Dow
Key Tower
127 Public Square, Suite 2000
Cleveland, Ohio 44114-1412

/s/ Bradley Bellisario
An Employee of Bellisario Law, LLC